

AO 257 (Rev. 6/78)

**DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT**BY: ☐ COMPLAINT ☐ INFORMATION ☒ INDICTMENT  
☐ SUPERSEDING**OFFENSE CHARGED**18 U.S.C. § 286 (Conspiracy to File  
False Claims) (One Count);  
18 U.S.C. § 1001 (False  
Statements) (Two Counts)**E-filing**☐ Petty  
☐ Minor  
☐ Misdemeanor  
☒ Felony**PENALTY:**18 U.S.C. § 286 - 10 yrs prison, \$250,000 fine, 3 yrs  
supervised release, \$100 assessment; 18 U.S.C. § 1001 - 5  
yrs prison, \$40,000 fine, 3 yrs supervised release, \$200  
assessment**PROCEEDING**

Name of Complainant Agency, or Person (&amp; Title, if any)

INTERNAL REVENUE SERVICE

☐ person is awaiting trial in another Federal or State  
Court, give name of court☐ this person/proceeding is transferred from another  
district per (circle one) FRCrP 20, 21 or 40. Show  
District☐ this is a reprosecution of  
charges previously dismissed  
which were dismissed on  
motion of:☐ U.S. Att'y ☐ Defense☐ this prosecution relates to a  
pending case involving this same  
defendant☒ prior proceedings or appearance(s)  
before U.S. Magistrate regarding  
this defendant were recorded underSHOW  
DOCKET NO.MAGISTRATE  
CASE NO.

11-mj-70884

Name and Office of Person  
Furnishing Information on MELINDA HAAG  
THIS FORM☒ U.S. Att'y ☐ Other U.S. AgencyName of Asst. U.S. Att'y  
(If assigned) THOMAS NEWMAN, AUSA, TAX DIV.Name of District Court, and/or Judge/Magistrate Location  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

DEFENDANT - U.S.

KHENDRIA WILLIAMS,

DISTRICT COURT NUMBER

**C.R 11 0588****DEFENDANT****IS NOT IN CUSTODY**

- 1) ☐ Has not been arrested, pending outcome this proceeding.  
If not detained give date any prior summons  
was served on above charges
- 2) ☐ Is a Fugitive
- 3) ☒ Is on Bail or Release from (show District)

**IS IN CUSTODY**

- 4) ☐ On this charge
- 5) ☐ On another conviction
- 6) ☐ Awaiting trial on other charges
- ☐ Fed'l ☐ State

If answer to (6) is "Yes", show name of institution

Has detainer  
been filed?☐ Yes  
☒ NoIf "Yes"  
give date  
filed**DATE OF  
ARREST**

Month/Day/Year

Or... if Arresting Agency &amp; Warrant were not

**DATE TRANSFERRED  
TO U.S. CUSTODY**

Month/Day/Year

☐ This report amends AO 257 previously submitted**ADDITIONAL INFORMATION OR COMMENTS****PROCESS:**☐ SUMMONS ☒ NO PROCESS\*☐ WARRANT Bail Amount: \_\_\_\_\_

If Summons, complete following:

☐ Arraignment ☐ Initial Appearance

Defendant Address: \_\_\_\_\_

\*Where defendant previously apprehended on complaint, no new summons  
or warrant needed, since Magistrate has scheduled arraignment

Date/Time: \_\_\_\_\_

Before Judge: \_\_\_\_\_

Comments: \_\_\_\_\_

United States District Court  
FOR THE  
NORTHERN DISTRICT OF CALIFORNIA  
VENUE: SAN FRANCISCO

FILED  
AUG 25 P 5 00  
D. W. WICKING  
U.S. DISTRICT COURT  
SAN FRANCISCO, CALIF.

UNITED STATES OF AMERICA,  
V.

CR 11 0588

RS

KHENDRIA WILLIAMS,

E-filing

DEFENDANT(S).

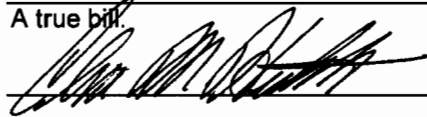
INDICTMENT

18 U.S.C. § 286 - Conspiracy to File False Claims (One Counts);

18 U.S.C. § 1001 - False Statements (Two Counts)

CR 11-0588-RB

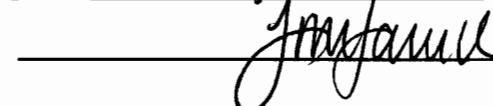
A true bill.



Foreman

Filed in open court this 25 day of

August 2011



Clerk

Bail, \$ no process



Nathanael Cousins  
United States Magistrate Judge

MELINDA HAAG (CABN 132612)  
United States Attorney

FILED  
2011 AUG 25 P 5:06  
RICHARD W. WIEKING  
CLERK U.S. DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

E-filing

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

RS

UNITED STATES OF AMERICA,

Plaintiff,

v.

KHENDRIA WILLIAMS,

Defendant.

**C.R. 11 0588**

VIOLATIONS:

18 U.S.C. § 286 (Conspiracy to File False  
Claims) (One Counts);

18 U.S.C. § 1001 (False Statements) (Two  
Counts)

SAN FRANCISCO VENUE

INDICTMENT

The Grand Jury charges:

COUNT ONE: (18 U.S.C. § 286 - Conspiracy to File False Claim)

Beginning in August 2008, and continuing until in or about March 2009, in the Northern  
District of California and elsewhere,

KHENDRIA WILLIAMS,

and others, both known and unknown to the Grand Jury, unlawfully, willfully, and knowingly  
agreed, combined, and conspired with others or each other to defraud the Internal Revenue  
Service, an agency of the United States, by obtaining or aiding to obtain the payment or  
allowance of false, fictitious, and fraudulent claims.

INDICTMENT

MANNER AND MEANS

1. KHENDRIA WILLIAMS, and others, both known and unknown to the Grand Jury, agreed to participate in, and participated in, a scheme to obtain or help others to obtain payment of false claims for refunds from the Internal Revenue Service ("IRS") by filing in their own names, or filing in the names of others, and by causing others to file, false 2007 and 2008 federal income tax returns claiming refunds to which they knew they were not entitled.

2. It was part of the conspiracy that KHENDRIA WILLIAMS procured the names and identities of others, through illegal means or by agreement with participants in the scheme, to file false federal tax returns using that identifying information.

3. As part of the scheme, KHENDRIA WILLIAMS electronically filed with the IRS, or assisted in filing, false federal income tax returns using names she acquired by agreement or through illegal means.

4. In order to obtain the fraudulent payment, KHENDRIA WILLIAMS agreed, combined, and conspired to use her bank accounts to receive payment. As part of the scheme, KHENDRIA WILLIAMS and others involved in the scheme requested on the false tax returns that the IRS directly deposit the fraudulent tax refund into her bank accounts.

All in violation of Title 18, United States Code, Section 286.

COUNT TWO: (18 U.S.C. § 1001 - False Statements)

On March 11, 2009, in the Northern District of California,

KHENDRIA WILLIAMS,

a resident of Pittsburg, California, did willfully and knowingly make and cause to be made materially false, fictitious, and fraudulent statements and representations regarding matters within the jurisdiction of the Internal Revenue Service, an agency of the United States, by stating to agents of the Internal Revenue Service during an investigation that WILLIAMS' Wells Fargo Bank account information was stolen and then that WILLIAMS gave her information to an individual named "Skully." WILLIAMS then and there knew her statements were false and that she used the Wells Fargo account as part of a scheme to defraud the United States.

All in violation of Title 18, United States Code, Section 1001.

INDICTMENT

1 COUNT THREE: (18 U.S.C. § 1001 - False Statements)

2 On March 11, 2009, in the Northern District of California,

3 KHENDRIA WILLIAMS ,

4 a resident of Pittsburg, California, did willfully and knowingly make and cause to be made  
5 materially false, fictitious, and fraudulent statements and representations regarding matters within  
6 the jurisdiction of the Internal Revenue Service, an agency of the United States, by stating to  
7 agents of the Internal Revenue Service during an investigation that WILLIAMS did not know  
8 R.N and C.B. WILLIAMS then and there knew her statements were false and that she was  
9 participating in a scheme to defraud the United States with C.B. and R.N.

10 All in violation of Title 18, United States Code, Section 1001.

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INDICTMENT

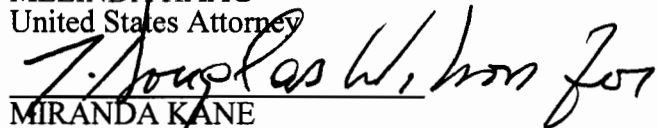
A True Bill

Dated:

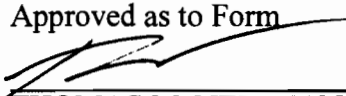
August 25, 2011

  
FOREPERSON

MELINDA HAAG  
United States Attorney

  
MIRANDA KANE  
Chief, Criminal Section

Approved as to Form

  
THOMAS M. NEWMAN  
Assistant United States Attorney  
Tax Division

INDICTMENT